

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

Alyssa Portnoy, et al,

PLAINTIFFS,

Vs.

National Credit Systems, Inc.

DEFENDANT.

Case No. 1:17-CV-00834-MRB

JUDGE MICHAEL R. BARRETT

**PLAINTIFFS' NOTICE OF NCS' FAILURE
TO COMPLY WITH THE AUGUST 17,
2021 ORDER**

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On August 17, 2021, this Court issued an Order that stated in part the following:

...defendant to provide plaintiff with 266 electronic placement files coming from Williamsburg to NCS no later than 09/07/2021; plaintiff to follow up with Court to set a follow up status conference.

On September 7, 2021 at 9:54 p.m. opposing counsel sent hundreds of computer generated documents to the undersigned that were not verified to have been prepared by Williamsburg. An example of of these documents is attached as Plaintiffs' Exhibit One (1).

Contrary to what limited Williamsburg documents had been produced by opposing counsel to justify the NCS' illegal charges to the relevant former Williamsburg tenants, these incomprehensible documents do not comply with the relevant Order.

Opposing counsel also informed the undersigned these documents would be inaccessible in three (3) days. As a result, Plaintiffs respectfully request this matter be set for an immediate telephonic pretrial conference.

Respectfully submitted,
s/ Michael D. Portnoy
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

A copy of this pleading was sent to all counsel of record by email.

s/ Michael D. Portnoy